



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 9, 2001

Mr. David A. Christian  
Senior Vice President - Nuclear  
Virginia Electric and Power Company  
5000 Dominion Blvd.  
Glen Allen, Virginia 23060

SUBJECT: SURRY UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: MAIN CONTROL  
ROOM BOTTLED AIR SYSTEM (TAC NOS. MA8588 AND MA8589)

Dear Mr. Christian:

The Commission has issued the enclosed Amendment No. 223 to Facility Operating License No. DPR-32 and Amendment No. 223 to Facility Operating License No. DPR-37 for the Surry Power Station, Unit Nos. 1 and 2, respectively. The amendments change the Technical Specifications (TS) in response to your application transmitted by letter dated March 29, 2000, as supplemented by letters dated December 6, 2000, and March 1, 2001.

These amendments revise TS Sections 3.19 and 4.1. The changes specify the requirements for two redundant trains of bottled air, specify remedial actions when one train or both trains are inoperable, eliminate the extension of the allowed outage and remedial action time of 8 hours to 24 hours currently permitted by TS 3.19.B, specify remedial actions for an inoperable control room pressure boundary, and include additional surveillance testing requirements. The Bases sections for TS 3.19 and TS 4.1 are revised for consistency with the respective TS.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, reading "Gordon E. Edison".

Gordon E. Edison, Senior Project Manager, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

Enclosures:

1. Amendment No. 223 to DPR-32
2. Amendment No. 223 to DPR-37
3. Safety Evaluation

cc w/encls: See next page

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/RA/

Gordon E. Edison, Senior Project Manager, Section 1  
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DATED: March 9, 2001

AMENDMENT NO. 223 TO FACILITY OPERATING LICENSE NO. DPR-32 - SURRY UNIT 1  
AMENDMENT NO. 223 TO FACILITY OPERATING LICENSE NO. DPR-37 - SURRY UNIT 2

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Surry Power Station

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UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-280

SURRY POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 223  
License No. DPR-32

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Virginia Electric and Power Company (the licensee) dated March 29, 2000, as supplemented December 6, 2000, and March 1, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-32 is hereby amended to read as follows:

(B) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 223 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

*Maitri Banerjee*

Maitri Banerjee, Acting Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: March 9, 2001



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

VIRGINIA ELECTRIC AND POWER COMPANY

DOCKET NO. 50-281

SURRY POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 223  
License No. DPR-37

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Virginia Electric and Power Company (the licensee) dated March 29, 2000, as supplemented December 6, 2000, and March 1, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-37 is hereby amended to read as follows:

(B) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 223 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

*Maitri Banerjee*

Maitri Banerjee, Acting Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: March 9, 2001



ATTACHMENT TO

LICENSE AMENDMENT NO. 223 TO FACILITY OPERATING LICENSE NO. DPR-32

LICENSE AMENDMENT NO. 223 TO FACILITY OPERATING LICENSE NO. DPR-37

DOCKET NOS. 50-280 AND 50-281

Remove Page

TS 3.19-1

TS 3.19-2

TS 4.1-5

TS 4.1-9c

Insert Page

TS 3.19-1

TS 3.19-2

TS 4.1-5

TS 4.1-9c

### 3.19 MAIN CONTROL ROOM BOTTLED AIR SYSTEM

#### Applicability

Applies to the ability to maintain a positive differential pressure in the main control room.

#### Objective

To specify functional requirements for the main control room bottled air system.

#### Specification

##### A. Requirements

Two trains of bottled air shall be OPERABLE and each shall be capable of pressurizing the main control room to a positive differential pressure with respect to adjoining areas of the auxiliary, turbine, and service buildings for one hour. A minimum positive differential pressure of 0.05 inches of water must be maintained when the control room is isolated under accident conditions. This capability shall be demonstrated by the testing requirements delineated in Technical Specification 4.1.

##### B. Remedial Action

1. With one train of the bottled air system inoperable, restore the inoperable train to OPERABLE status within 7 days or both units shall be placed in HOT SHUTDOWN within the next 8 hours.
2. With both trains of the bottled air system inoperable, restore one train to OPERABLE status within 8 hours or both units shall be placed in HOT SHUTDOWN within the same 8 hours.
3. With an inoperable control room pressure boundary, restore the boundary to OPERABLE status within 8 hours or both units shall be placed in HOT SHUTDOWN within the same 8 hours. The control room pressure boundary may be intermittently opened under administrative control.

If the requirements of Specification 3.19.B.1, 3.19.B.2, or 3.19.B.3 are not met within 48 hours after achieving HOT SHUTDOWN, both units shall be placed in COLD SHUTDOWN within the next 30 hours.

#### Basis

Following a design basis accident, the containment will be depressurized to subatmospheric condition in less than 1 hour; thus, terminating leakage from the containment. The main control room is maintained at a positive differential pressure using bottled air during the period when containment leakage may exist to prevent contamination.

The main control room is contained in the control room pressure boundary or envelope, which is defined in the Technical Specification 3.23 Basis.

The control room pressure boundary is permitted to be opened intermittently under administrative control without declaring the boundary inoperable. The administrative control must provide the capability to re-establish the control room pressure boundary. For normal ingress into and egress from the pressure boundary, the individual entering or exiting the area has control of the door.

The refueling water storage tank is sampled weekly for  $\text{Cl}^-$  and/or  $\text{F}^-$  contaminations. Weekly sampling is adequate to detect any inleakage of contaminated water.

#### Control Room Bottled Air System

The control room bottled air system is required to establish a positive differential pressure in the control room for one hour following a design basis accident. The ability of the system to meet this requirement is verified by: 1) checking air bottle pressurization, 2) demonstrating the capability to pressurize the control room pressure boundary, 3) functionally testing the pressure control valve(s), and 4) functionally testing the manual and automatic actuation capability. The test requirements and frequency are specified in Table 4.1-2A.

TABLE 4.1-2A (CONTINUED)  
MINIMUM FREQUENCY FOR EQUIPMENT TESTS

<u>DESCRIPTION</u>	<u>TEST</u>	<u>FREQUENCY</u>	<u>FSAR SECTION REFERENCE</u>
14a. Service Water System Valves in Line Supplying Recirculation Spray Heat Exchangers	Functional	Once per 18 months	9.9
b. Service Water System Valves Isolating Flow to Non-essential loads on Intake Canal Low Level Isolation	Functional	Once per 18 months	9.9
15. Control Room Bottled Air System			
a. Air Bottle Pressure	* Verify each bank pressurized to a minimum of 2350 psig	Monthly	9.13
b. Positive Differential Pressure Capability	* Demonstrate ability to maintain positive differential pressure as required by Technical Specification 3.19 by pressurizing the boundary using either one of the ventilation system fans with orificed flow (simulating discharge of one train of bottled air) or by discharging one train of the bottled air system	Once per 18 months	9.13
c. Pressure Control Valve(s) Functionality	* Demonstrate ability to pressurize the boundary to 0.05 inches of water for 1 hour as required by Technical Specification 3.19 by discharging each train of the bottled air system	Once per 18 months	9.13
d. Manual Actuation Capability	* Functional	Once per 18 months	9.13
e. Automatic Actuation Capability	* Functional	Once per 18 months	9.13
16. Reactor Vessel Overpressure Mitigating System (except backup air supply)	Functional & Setpoint	Prior to decreasing RCS temperature below 350°F and monthly while the RCS is < 350°F and the Reactor Vessel Head is bolted	4.3
	CHANNEL CALIBRATION	Once per 18 months	
17. Reactor Vessel Overpressure Mitigating System Backup Air Supply	Setpoint	Once per 18 months	4.3
18. Power-Operated Relief Valve Control System	Functional, excluding valve actuation	Monthly	4.3
	CHANNEL CALIBRATION	Once per 18 months	

Amendment Nos. 223 and 223

TS 4.1-9c



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 223 TO FACILITY OPERATING LICENSE NO. DPR-32

AND AMENDMENT NO. 223 TO FACILITY OPERATING LICENSE NO. DPR-37

VIRGINIA ELECTRIC AND POWER COMPANY

SURRY POWER STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-280 AND 50-281

**1.0 INTRODUCTION**

By letter dated March 29, 2000, as supplemented by letters dated December 6, 2000, and March 1, 2001, Virginia Electric and Power Company (the licensee) requested amendments to Technical Specifications (TS) and Bases for Facility Operating License Nos. DPR-32 and DPR-37 for the Surry Power Station, Units 1 and 2. The proposed changes will revise TS 3.19, "Main Control Room Bottled Air System," and the associated Bases and the Bases of TS 4.1. In addition, the licensee requested a change to TS Table 4.1-2A, Item 15. The requested changes specify two redundant trains of bottled air, include remedial action statements for one train and two trains inoperable, eliminate the extension of 8 hours to 24 hours currently permitted by TS 3.19.B, add requirements for an inoperable control room pressure boundary, and include additional surveillance testing requirements. The December 6, 2000, supplemental letter submitted by the licensee contained clarifying information only, and did not change the initial no significant hazards consideration determination. The March 1, 2001, letter made it clear that the December 6, 2000, letter did not supersede the March 29, 2000, application and provided only clarification.

**2.0 BACKGROUND**

TS 3.19 was originally titled "Main Control Room Ventilation System." It required a bottled air bank to pressurize the main control room to a positive pressure, but no action statement was specified when this requirement could not be met. The original Surry TS included Table 4.1-2A, Item 15, that required periodic testing of the ability to maintain positive pressure in the control room for 1 hour using a volume of air equivalent to or less than that stored in the bottled air supply at a minimum frequency of once in each refueling interval (approximately every 12-18 months). On September 23, 1974, the licensee requested Amendment 1/1 to incorporate remedial action to be taken in the event of a loss of bottled air in the main control room ventilation system (i.e., 8 hours to hot shutdown and an additional 48 hours to cold shutdown). These requirements for a bottled air bank and Table 4.1-2A surveillance, and Amendment 1/1 remedial action, continue to exist in the current TS. In response to NUREG-0737, Item III.D.3.4, the licensee made a commitment to provide redundancy in the control room bottled air system. In 1983, a redundant source of bottled air was installed without a corresponding TS change. However, TS Amendments 92/91, dated January 17, 1984, revised the terminology in the specification from "main control room ventilation system" to "main control room bottled air system." Also, TS Amendments 92/91 extended the 8-hour action statement to

Enclosure

24 hours, provided that tests during the 8-hour period demonstrated that the emergency control room ventilation system is functional. In addition, the surveillance frequency in Table 4.1-2A was changed from each refueling interval to once every 18 months in TS Amendment 213/213 dated June 11, 1998.

### 3.0 EVALUATION

TS 3.19.B currently permits extension of an 8-hour remedial action to 24 hours if tests demonstrate that the control room emergency ventilation system is functional. However, in submittals dated March 29 and December 6, 2000, the licensee stated that subsequent to the installation of the redundant train of bottled air, a station deviation report identified that the extension of the 8-hour remedial action to 24 hours permitted by TS 3.19.B was inappropriate because it was inconsistent with control room dose calculations. Operation of the control room emergency ventilation system fans is intended to extend pressurization of the control room areas and the supply of breathing air upon depletion of bottled air. However, as currently written, TS 3.19.B is ambiguous and could be interpreted to mean that alternate use of the control room ventilation fans during the first hour following an accident is acceptable. In the event that the fans were operated during the first hour following a design basis accident, the resultant control room doses could exceed General Design Criterion (GDC) 19 limits, which is unacceptable. To address the station deviation concern, operator guidance was instituted prohibiting operation of the fans during the first hour following an accident condition. The prohibition of control room ventilation fan operation has continued to be imposed by TS-related administrative controls. This requested TS change eliminates the allowed extension of the remedial action time from 8 hours to 24 hours. Specifically, the requested change will:

1. revise the specification to reflect the Main Control Room (MCR) bottled air system configuration of two redundant trains,
2. add a remedial action time of 7 days for one train inoperable consistent with the TS-related administrative controls; and for both trains inoperable, retains the 8-hour remedial action to place both units in hot shutdown,
3. retain the remedial action that if these requirements are not met within 48 hours after achieving hot shutdown, place both units in cold shutdown, and
4. add a timeframe of the next 30 hours to achieve cold shutdown.

The current and proposed requirements for TS 3.19 are:

#### 3.19 MAIN CONTROL ROOM BOTTLED AIR SYSTEM

##### Current

##### "A. Requirements

A bottled dry air bank shall be available to pressurize the main control room to a positive differential pressure with respect to adjoining areas of the auxiliary, turbine, and service buildings for one hour. A minimum positive differential pressure of 0.05 inches of water must be maintained when the control room is isolated under accident conditions. This

capability shall be demonstrated by the testing requirement delineated in Technical Specification 4.1."

Proposed

"A. Requirements

Two trains of bottled air shall be OPERABLE and each shall be capable of pressurizing the main control room to a positive differential pressure with respect to adjoining areas of the auxiliary, turbine, and service buildings for one hour. A minimum positive differential pressure of 0.05 inches of water must be maintained when the control room is isolated under accident conditions. This capability shall be demonstrated by the testing requirements delineated in Technical Specification 4.1."

This change is in accordance with a commitment the licensee made with respect to complying with NUREG-0737, Item III.D.3.4, to provide redundancy in the control room bottled air portion of the system to meet the single failure criterion. The licensee stated that, "in 1983, a redundant source of bottled air was installed with no associated TS revisions." This change revises the TS to reflect the addition of the redundant source of bottled air. The NRC staff review and assessment found that this change adds conservatism to the Main Control Room Ventilation System and is in accordance with the licensee's commitment to provide redundancy in the control room bottled air portion of the system. Therefore, the staff finds this change acceptable.

Current

"B. Remedial Action

If the requirements of Specification 3.19.A are not met, the unit shall be placed in the hot shutdown condition within 8 hours; except that if tests during the 8-hour period demonstrate that the emergency control room ventilation system is functional, the unit shall be brought within the requirements of Specification 3.19.A or placed in the hot shutdown condition within 24 hours.

If the requirements of Specification 3.19.A are not met within 48 hours after achieving hot shutdown condition, the unit shall be placed in the cold shutdown condition."

Proposed

"B. Remedial Action

1. With one train of the bottled air system inoperable, restore the inoperable train to OPERABLE status within 7 days or both units shall be placed in HOT SHUTDOWN within the next 8 hours.
2. With both trains of the bottled air system inoperable, restore one train to OPERABLE status within 8 hours or both units shall be placed in HOT SHUTDOWN within the same 8 hours.



3. With an inoperable control room pressure boundary, restore the boundary to OPERABLE status within 8 hours or both units shall be placed in HOT SHUTDOWN within the same 8 hours. The control room pressure boundary may be intermittently opened under administrative control.

If the requirements of Specification 3.19.B.1, 3.19.B.2, or 3.19.B.3 are not met within 48 hours after achieving HOT SHUTDOWN, both units shall be placed in COLD SHUTDOWN within the next 30 hours."

The licensee stated, and the staff agrees, that the existing TS 3.19 includes an 8-hour remedial action time to place the unit(s) in hot shutdown for system inoperability. With the proposed redundant train configuration, system inoperability has been taken to mean both trains of bottled air are in an inoperable condition. With the proposed change, this will require placing the unit(s) in hot shutdown within 8 hours. The staff has determined that this change makes the TS more conservative. In addition, as stated above, it adds a remedial action time of 7 days for one train inoperable, and retains the 8-hour remedial action to place both units in hot shutdown when both trains are inoperable. It also retains the remedial action that if at least one train is not made operable within 48 hours after achieving hot shutdown, to place both units in the cold shutdown condition within the next 30 hours. The staff finds that the proposed change is conservative, it provides an acceptable margin of safety, and it is consistent with allowed outage time for one train inoperable as outlined in NUREG-1431, Rev. 1. Therefore, the staff finds this change acceptable.

With respect to the control room pressure boundary being intermittently opened under administrative control, the NRC staff has previously approved, generically, in Technical Specification Task Force (TSTF)-287, Rev. 5, the control room pressure boundary to be inoperable for up to 24 hours. The TSTF-287, Rev. 5, will be incorporated into the next revision of NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Rev. 1, April 1995. The basis for this approval is: (a) the low probability of occurrence of an event requiring an intact control room boundary during the 24-hour period; and (b) the availability of compensatory measures. Also, intermittent opening of the control room boundary was approved in TSTF-287 provided administrative controls are in place that ensure the capability to re-establish the control room boundary. Therefore, the intermittent opening of the control room boundary with administrative controls, as proposed by the licensee in submittals dated March 29 and December 6, 2000, is consistent with TSTF-287, Rev. 5, and is acceptable.

With respect to the proposed changes for Table 4.1-2A as outlined in the licensee's submittal dated December 6, 2000, the NRC staff reviewed these changes and found them to be consistent with the proposed changes for TS 3.19. The staff found that these changes are appropriate for checking air bottle pressurization, demonstrating the capability to pressurize the control room pressure boundary, and functionally testing the pressure control valves and the manual and automatic actuation capability of the system. The staff finds these changes acceptable.

In addition to the TS outlined above, the corresponding Bases of TS 3.19 and 4.1 are modified to reflect the proposed TS changes. The NRC staff reviewed the changes to the Bases of TS 3.19 and 4.1 associated with the proposed TS changes and found the changes acceptable.

The NRC staff review and assessment of the proposed changes outlined above found that the changes to TS 3.19 and 4.1 and the associated Bases are within regulatory guidelines and provide reasonable assurance of safety, and are therefore acceptable.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Virginia State official was notified of the proposed issuance of the amendments. The State official had no comment.

#### 5.0 ENVIRONMENTAL CONSIDERATION

These amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration, and there has been no public comment on such finding (65 FR 48761). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: H. Walker

Date: March 9, 2001